Erika M. Nash (Wyo. Bar No. 6-3867)

LONG REIMER WINEGAR BEPPLER LLP

270 West Pearl Street, Suite 103

P.O. Box 3070

Jackson, Wyoming 83001 Telephone: (307) 734-1908 Facsimile: (307) 733-3752 Email: enash@lrw-law.com

Attorneys for Michael V. DeFelice and Babette R. DeFelice, Defendants

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF WYOMING

NEPCO FUND II LLC,)
Plaintiff,))
vs.	Civil Action No. 12-CV-246-F
MICHAEL V. DeFELICE, and BABETTE DeFELICE,)))
Defendants,	
)
)

STIPULATED MOTION FOR EXTENSION OF TIME WITHIN WHICH TO RESPOND OR OTHERWISE DEFEND AGAINST PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT

COMES NOW, Defendants Michael V. DeFelice and Babette DeFelice, (hereinafter referred to as "Defendant"), by and through their attorney Erika Nash of Long Reimer Winegar Beppler LLP, and Plaintiff by and through its attorney Susan Stubson of Crowley Fleck PLLP, pursuant to F.R.C.P. 6(b), that the District Court Judge grant an additional eight (8) days, up to and including January 30, 2013, within which to respond or otherwise defend against Plaintiff's Motion for Summary Judgment as follows:

Case 1:12-cv-00246-NDF Document 14 Filed 01/18/13 Page 2 of 3

1. Counsel for Defendant's Response to the Motion for Summary Judgment is due

on January 22, 2013. Counsel for Defendant is out of town until and including January 22, 2013,

and will not have sufficient time to prepare a response by January 22, 2013.

2. This Motion is timely filed. On information and belief, the extension of time to

respond will not conflict with any other Orders of this Court in this matter.

3. Defendant's attorney contacted Plaintiff's attorney to ascertain whether she would

stipulate to this Motion. Plaintiff's attorney, Susan Stubson, stipulates to this Motion.

4. A copy of an Order for the Judge's use in granting Defendant's Motion is filed

contemporaneously herewith.

DATED this 18th day of January, 2013.

Michael V. DeFelice and Babette DeFelice

/s/ Erika M. Nash

Erika M. Nash (Wyo. Bar No. 6-3867)

LONG REIMER WINEGAR BEPPLER LLP

270 West Pearl Street, Suite 103

Jackson, Wyoming 83001

P.O. Box 3070

Telephone: (307) 734-1908

Facsimile: (307) 733-3752

Email: enash@lrw-law.com

CERTIFICATE OF SERVICE

I hereby certify that on the 18th day of January, 2013, I caused a true and correct copy of the foregoing to be served on the following parties by depositing a copy of the same in the United States mail, first class postage prepaid, addressed as follows, and that all attorneys of record also were served electronically via the Court's electronic noticing system:

Timothy M. Stubson
Susan C. Stubson
Crowley Fleck PLLP
152 North Durbin Street, Suite 220
Casper, WY 82601
(307) 265-2279
(307) 265-2307 (fax)
tstubson@crowleyfleck.com
sstubson@crowleyfleck.com
Attorney for Plaintiff

/s/ Erika M. Nash